

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Civil Action No.  
03 MDL 1570 (RCC)

**NOTICE OF MOTION**

This document relates to:

Thomas E. Burnett, Sr., et al. v. Al Baraka  
Investment and Development Corp., et al.,  
03 CV 9849 (RCC)

Thomas E. Burnett, Sr., et al. v. Al Baraka  
Investment and Development Corp., et al.,  
03 CV 5738 (RCC)

PLEASE TAKE NOTICE that pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, and upon the annexed Declaration of Kenneth A. Caruso, dated July 16, 2004, including the exhibits attached thereto, the undersigned will move this Court, before the Honorable Richard C. Casey, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order admitting Viet D. Dinh, Esq., *pro hac vice*, as co-counsel for defendant Yousef Jameel for the purposes of the above captioned case.

Dated: New York, New York  
July 16, 2004

CHADBOURNE & PARKE LLP

By

  
Kenneth A. Caruso (KC-7769)

A Member of the Firm  
30 Rockefeller Plaza  
New York, New York 10112  
(212) 408-5100

Attorneys for Defendant Yousef Jameel

TO: All Counsel of Record (via Email)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Civil Action No.  
03 MDL 1570 (RCC)

**DECLARATION OF**  
**KENNETH A. CARUSO**

This document relates to:

Thomas E. Burnett, Sr., et al. v. Al Baraka  
Investment and Development Corp., et al.,  
03 CV 9849 (RCC)

Thomas E. Burnett, Sr., et al. v. Al Baraka  
Investment and Development Corp., et al.,  
03 CV 5738 (RCC)

KENNETH A. CARUSO, an attorney admitted to practice before the courts of this state, declares the following under the penalties of perjury:

1. I am a member of the Bar of this Court and a member of the firm of Chadbourne & Parke LLP, counsel to defendant Yousef Jameel. I submit this declaration in support of Mr. Jameel's motion, pursuant to Local Rule 1.3(c), to permit Viet D. Dinh, Esq. to appear, *pro hac vice*, as co-counsel for Mr. Jameel for the purposes of the above-captioned case.

2. Mr. Dinh is a professor at the Georgetown University Law Center, 600 New Jersey Ave., NW, Washington, DC 20001, (202) 662-9324.

3. Attached hereto as Exhibit A is the Affidavit of Viet D. Dinh, sworn to July 14, 2004. As stated in Mr. Dinh's affidavit, and as evidenced by the Certificate of Good Standing annexed thereto as Exhibit 1, Mr. Dinh is admitted to the Bar of the District of Columbia. Mr. Dinh is also a member in good standing of the bar of the Supreme Court of the United States.

4. Defendant Yousef Jameel respectfully requests that Mr. Dinh be permitted to appear in this case, *pro hac vice*, as counsel for defendant Yousef Jameel.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on July 16, 2004.



KENNETH A. CARUSO

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Civil Action No.  
03 MDL 1570 (RCC)

**AFFIDAVIT OF  
VIET D. DINH**

This document relates to:

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Investment and Development Corp., et al.,  
03 CV 9849 (RCC)

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Investment and Development Corp., et al.,  
03 CV 5738 (RCC)

VIET D. DINH, under penalty of perjury, deposes and says:

1. I am a professor at the Georgetown University Law Center, 600 New Jersey Ave., NW, Washington, DC 20001, (202) 662-9324. I submit this affidavit in support of defendant Yousef Jameel's application for my admission, *pro hac vice*, to practice before this Court and represent Mr. Jameel for the purposes of the above-captioned case.

2. I am a member in good standing of the Bar of the District of Columbia, having been admitted to practice before that bar on December 10<sup>th</sup>, 1997. A certificate of good standing from that bar is attached hereto as Exhibit 1. I am also a member in good standing of the bar of the Supreme Court of the United States.

3. I am not presently, nor have I ever been, suspended, disbarred, or otherwise disciplined in any of the courts or jurisdictions where I have been admitted to practice.

4. I have obtained a copy of the local rules of the Southern District of New York, and am familiar with those rules.

5. I hereby consent to be subject to the jurisdiction and rules of the state of New York governing professional conduct.



Viet D. Dinh

Sworn to before me this  
14<sup>th</sup> day of July, 2004



Dorothy A. Boothby  
Notary Public  
District of Columbia  
My Commission Expires May 14, 2007



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

VIET D. DINH

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was on the 10<sup>th</sup> day of DECEMBER, 1997

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on July 9,  
2004.

GARLAND PINKSTON, JR., CLERK

By: Christopher C. Dinh  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Civil Action No.  
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Certificate of Service

This document relates to:

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03 CV 5738 (RCC)

JEFFREY I. WASSERMAN, a member of the Bar of this Court, deposes and says,  
under penalty of perjury:

1. I am not a party to this action, I am over 18 years of age, and I am an associate at Chadbourne & Parke LLP, 30 Rockefeller Plaza, New York, New York 10112.
2. On July 16, 2004, I caused true and correct copies of the Notice of Motion for an order admitting Viet D. Dinh, Esq., *pro hac vice*, as co-counsel for defendant Yousef Jameel for the purposes of the above captioned case to be served upon all counsel of record via email pursuant to paragraph 9(b) of Case Management Order #2.

Jeffrey I. Wasserman (JW-9619)